

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

NAPOLÉON SEPÚLVEDA MORENO, §
and LUZ MARIA MARTINEZ CASTRO, §
and SANDRA LIZETTE CARDENAS §
RAMIREZ, as Next Friend of §
S.S.C., minor child, §
Individually and for and on behalf of §
All Those Who Are Entitled To Recover §
Under The Texas Wrongful Death §
and Survival Acts for the Death of §
JESUS IVAN SEPÚLVEDA MARTINEZ, §
and BRENDA BERENICE CASIAS §
CARRILLO, §

Plaintiffs, §

v. §

NO. 3:24-CV-00059-DB

LASALLE CORRECTIONS V LLC, §

Defendant. §

**PLAINTIFFS' OBJECTIONS TO DEFENDANT LASALLE CORRECTIONS V, LLC'S
EXHIBIT LIST**

TO THE HONORABLE DAVID BRIONES, SENIOR UNITED STATES DISTRICT JUDGE:

COME NOW Plaintiffs in the above-entitled and captioned cause and pursuant to Local Rule CV-16(g)(2), file their objections to Defendant LaSalle Corrections V, LLC's Exhibit List.

In support of their objections, Plaintiffs hereby submit the following:

SPECIFIC OBJECTIONS

Exhibit	Title or Description	Objection	Sustained/ Overruled	Partial Ruling
D-9	LaSalle Corrections List of Vehicles. LaSalle 000327-000328	Objection on basis of Fed. R. Evid. 401 and 403. May withdraw		

		objection by time of trial.		
D-12	Photo of Map.	Objection on basis of Fed. R. Evid. 401 and 403. May withdraw objection by time of trial.		
D-13	Title and Purchase Documents for LaSalle Work Truck LaSalle 000225-000226	Objection on basis of Fed. R. Evid. 401 and 403. May withdraw objection by time of trial.		
D-14	Department of Homeland Security Office of Inspector General Report of Investigation and Related Correspondence Plaintiffs 001676-001704	Objection on basis of Fed. R. Evid. 401 and 403.		

Respectfully submitted,

BENOIT LEGAL, P.L.L.C.
311 Montana Ave, Suite B
El Paso, Texas 79902
(915)532-5544
(915) 532-5566 Fax

/s/ Christopher Benoit

Christopher Benoit
Texas Bar No. 24068653
chris@coylefirm.com

and

LYNN COYLE
Texas Bar No. 24050049
LYNN COYLE, ESQ.
2700 Richmond Ave.
El Paso, Texas 79930
lynn@coylefirm.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned counsel certifies that on August 12, 2025, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Christopher Benoit

Christopher Benoit